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February 3, 2021

VIA E-MAIL TO CHAMBERS

Honorable Michael B. Kaplan, Chief Judge
United States Bankruptcy Court, District of New Jersey
402 East State Street
Trenton, NJ 08608
Courtroom #8

Re: Hollister Construction Services, LLC v. Arch Insurance Company And Arch Reinsurance Company, et al., Adv. Pro. No. 20-01396

Dear Chief Judge Kaplan:

This firm represents plaintiff Hollister Construction Services, LLC (“Hollister”) in the above-captioned proceeding (the “Arch Adversary Proceeding”). On January 8, 2021, the Court entered an *Order to File Settlement Documents* (the “Arch Settlement Documents Order”) (Docket No. 59) in the Arch Adversary Proceeding directing the filing of appropriate settlement document(s) within thirty (30) days of the date of the Arch Settlement Documents Order, *i.e.*, by February 7, 2021.¹

We write to respectfully request that the Court extend the deadline to file settlement documents under the Arch Settlement Documents Order for thirty (30) days, from February 7, 2021 to March 9, 2021, to allow the settlement between the Debtor, Newark Warehouse Urban Renewal, LLC and Newark Warehouse Redevelopment Company, LLC (the “NWR Entities”) and certain of the defendants in the Arch Adversary Proceeding (the “NWR Settlement”) to be fully consummated. The Court approved the NWR Settlement on January 8, 2021 and granted certain related declaratory and injunctive relief. *See Order Approving Settlement and Compromise Between the Debtor and Newark Warehouse Urban Renewal, LLC/Newark Warehouse Redevelopment Company, LLC Pursuant to Fed. R. Bankr. P. 9019* (Case No. 19-27439, Docket No. 1598); *Order Granting Declaratory and Injunctive Relief* (Adv. Pro. No. 20-01396, Docket No. 58). Since the entry of those Orders, the Debtor and the NWR Entities have worked diligently to satisfy the conditions to the NWR Entities’ payment of the settlement amount and consummation of the NWR Settlement as described in those Orders. The Debtor and the NWR Entities believe that the additional thirty (30) days sought will allow for all events necessary for consummation of the NWR Settlement to occur such that the Debtor can file the appropriate documents to seek dismissal of the Arch Adversary Proceeding shortly thereafter.

¹ February 7, 2021 falls on a Sunday.

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We are available if the Court has any questions. Thank you for Your Honor's kind attention to this matter.

Respectfully submitted,

/s/ Joseph J. DiPasquale

Joseph J. DiPasquale

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cc: Joseph L. Schwartz, counsel for the NWR Entities (*via e-mail*)